

THE WEITZ LAW FIRM, P.A.

Bank of America Building
18305 Biscayne Blvd., Suite 214
Aventura, Florida 33160

September 14, 2021

VIA CM/ECF

Honorable Judge Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square - Courtroom 443
New York, New York 10007

**Re: Velasquez v. 60th Street LLC, d/b/a The Jeffrey Craft Beer & Bites, et al.-
Case 1:21-cv-02948-VEC**

Dear Judge Caproni:

The undersigned represents the Plaintiff in the above-captioned case matter.

Pursuant to Order D.E. 11, dated July 16, 2021, and Order of extension [D.E. 13], dated August 12, 2021, stated Plaintiff must move for default judgment by September 13, 2021.

On September 13, 2021, Plaintiff's counsel requested a second extension of time of 14 days [D.E. 14], to move for default judgment in order to allow time for the defendants to contact the undersigned for the compelling reasons set forth in said extension request [D.E. 14].

On September 14, 2021, the Court denied said extension request on the basis that it was not in compliance with Rule 2(C) of the Court's Individual Practices in Civil Cases [D.E. 15]. Undersigned counsel hereby respectfully request the Court's reconsideration of said denial [D.E. 15].

Undersigned counsel had recently observed the non-working holiday of Rosh Hashanah, which commenced on the evening of September 6, 2021 and concluded on the evening of September 8, 2021, as well as Shabbat holiday commencing on the evening of September 10, 2021 to the evening of September 11, 2021, which undersigned counsel does observe. The following early Sunday morning on September 12, 2021, undersigned counsel subsequently flew out-of-state and has been traveling out of state since said time. In addition, undersigned counsel's youngest three year old daughter had recently suffered a high fever (thankfully not Coronavirus as confirmed by a subsequent test), which required a portion of undersigned's time (albeit remotely). For the aforementioned compelling reasons, it was significantly difficult for undersigned counsel to timely file the aforementioned extension request by Sunday, September 12, 2021 (which is also a non-business day), in compliance with Rule 2(C) of the Court's Individual Practices in Civil Cases.

For the aforementioned compelling reasons, undersigned counsel hereby respectfully requests that this Honorable Court to reconsider its Denial [D.E. 15] of said extension request [D.E. 14], in

light of the aforementioned completing reasons. Undersigned counsel also hereby assures the Court that the requested two week extension [D.E. 14], if granted, would be the final extension request in this matter, and that no parties have been prejudiced.

Thank you for your reconsideration of said extension request [D.E. 14], and subsequent denial [D.E. 15].

Sincerely,

By: /S/ B. Bradley Weitz
B. Bradley Weitz, Esq. (BW9365)
THE WEITZ LAW FIRM, P.A.
Attorney for Plaintiff
Bank of America Building
18305 Biscayne Blvd., Suite 214
Aventura, Florida 33160
Telephone: (305) 949-7777
Facsimile: (305) 704-3877
Email: bbw@weitzfirm.com